

October 20, 2020

Teresa Cooper
Market Analysis Manager
NAIC Central Office
1100 Walnut Street, Suite 1500
Kansas City, MO 64106-2197

VIA Electronic Mail: tcooper@naic.org

RE: Proposed MCAS Blanks for Travel Insurance

Dear Ms. Cooper:

The American Property Casualty Insurance Association (APCIA)¹ writes in support of the proposed MCAS reporting template for travel insurance submitted by the U.S. Travel Insurance Association (“USTiA”) on October 19, 2020. The USTiA template (“Template”) is consistent with those utilized for other lines of business and with the long-stated purposes of the collection of MCAS data as part of state market analysis efforts.

The Template provides for collection of appropriate market-related data from individual companies to allow for individual state regulators to compare different insurers offering travel coverage in their jurisdictions. As MCAS has always been intended to function, this comparison affords regulators uniform summary data to be used to identify outliers among insurers that may warrant further analysis.

The idea of considering the collection of transactional data while the very concept is under discussion and debate at the Market Conduct Annual Statement Blanks Working Group is both premature and inappropriate. APCIA strongly supports utilization of the USTiA template for discussion and development of MCAS data collection for travel insurance.

¹ The American Property Casualty Insurance Association (APCIA) is the primary national trade association for home, auto, and business insurers. APCIA promotes and protects the viability of private competition for the benefit of consumers and insurers, with a legacy dating back 150 years. APCIA members represent all sizes, structures, and regions-protecting families, communities, and businesses in the U.S. and across the globe.



Thank you for the opportunity to provide comments. APCIA looks forward to working with you in developing an effective template for collection of travel insurance MCAS data. If you have any questions or would like to discuss any of our comments further, please let us know.

Respectfully Submitted,

A handwritten signature in black ink that reads "Lisa Brown" with a long horizontal flourish extending to the right.

Lisa Brown
Sr. Director, Market Conduct and Counsel